

BRUCE D. GOLDSTEIN, State Bar No. 135970  
 County Counsel  
 ANNE L. KECK, State Bar No. 136315  
 Deputy County Counsel  
 County of Sonoma  
 575 Administration Drive, Room 105A  
 Santa Rosa, California 95403-2815  
 Telephone: (707) 565-2421  
 Facsimile: (707) 565-2624  
 E-mail: akeck@sonoma-county.org

Attorneys for Defendants the County  
 of Sonoma, Former Sheriff-Coroner William  
 Cogbill, and County employees Michael  
 Shanahan, Brian K. Covington, Caroline  
 Japp, Jo Weber, Nicholas Honey, Jerry  
 Allen, Betty Johnson, and Robin Smith

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

SALLY STEINHART,

No. CV-10-00841 RS

Plaintiff,

v.

COUNTY OF SONOMA, et al.,

Defendants.

**STIPULATION FOR ORDERS TO: (1)  
 CONTINUE HEARING ON MOTIONS  
 TO DISMISS AND TO STRIKE; (2)  
 EXTEND BRIEFING SCHEDULES;  
 AND (3) CONTINUE CASE  
 MANAGEMENT CONFERENCE;  
 [PROPOSED] ORDER**

/

This joint stipulation is entered into by and between Plaintiff in pro per, Sally Steinhart (“Plaintiff”), and Defendants the County of Sonoma, former Sheriff-Coroner William Cogbill, and County employees Michael Shanahan, Brian K. Covington, Caroline Jaap, Jo Weber, Nicholas Honey, Jerry Allen, Betty Johnson and Robin Smith (collectively, “County Defendants”). Through this stipulation, these parties request the Court to enter an order: (1) continuing the hearing on the

pending Motion to Dismiss Third Amended Complaint, and Anti-SLAPP Motion to Strike, to September 29, 2011; (2) extending the briefing schedule on such Motions to permit Plaintiff to file her oppositions through August 31, 2011, and for County Defendants to file their replies through September 8, 2011; and (3) continuing the Case Management Conference, currently set for August 25, 2011, to September 29, 2011, at 1:30 p.m., so that it may be heard at the same time as the pending motions. Defendant the State Department of Social Services and other named defendants have not appeared in this action, and are not parties to this stipulation.

### RECITALS

A. Plaintiff initiated this action on February 26, 2010, and later filed her Third Amended Complaint for Declaratory and Injunctive Relief and Damages on June 27, 2011 (Dkt. No. 46, the “TAC”). In response, on July 29, 2011, County Defendants filed their Motion to Dismiss the TAC (Dkt. No. 47) and Anti-SLAPP Motion to Strike under CCP § 425.16 (Dkt. No. 50), collectively referred to herein as the “Motions”. Both of the Motions are currently set for hearing on September 8, 2011, at 1:30 p.m.

B. Pursuant to Civil Local Rules, Plaintiff’s oppositions to the Motions are due to be filed and served on or before August 12, 2011; County Defendants’ replies are due to be filed seven days after filing/service of the oppositions.

C. County Defendants have agreed to provide Plaintiff with additional time in which to file and serve her oppositions to the pending Motions through August 31, 2011. In addition, Plaintiff has agreed to extend the time in which County Defendants may file their replies to such oppositions through September 8, 2011.

D. Based on the requested extension of this briefing schedule, the parties also request that the hearing on the pending Motions, currently set for September 8, 2011, be continued to

September 29, 2011, at 1:30 p.m., which will provide the Court with additional time in which to review the papers.

E. To conserve the resources of the parties and the Court, the parties further request the Court to continue the Case Management Conference, currently set for August 24, 2011, to September 29, 2011, at 1:30 p.m., so that it may be held at the same time as the hearings on the pending Motions.

WHEREFORE, the parties to this stipulation hereby agree and request entry of a Court order as follows:

**STIPULATION**

1. The hearing on County Defendants' pending Motion to Dismiss the TAC (Dkt. No. 47) and Anti-SLAPP Motion to Strike under CCP § 425.16 (Dkt. No. 50) be continued to September 29, 2011, at 1:30 p.m.
2. The briefing schedule on such Motions be extended to permit Plaintiff to file her oppositions through August 31, 2011, and for County Defendants to file their replies through September 8, 2011.
3. The Case Management Conference, currently set for August 25, 2011, be continued to September 29, 2011, at 1:30 p.m. A joint case management conference statement shall be filed one week prior to the conference.
4. This stipulation does not prevent or preclude the parties from seeking additional relief from this Court, to amend this stipulation and order or otherwise.

Respectfully submitted,

Dated: August 12, 2011

Bruce D. Goldstein, County Counsel

By: /s/ Anne L. Keck  
Anne L. Keck, Deputy County Counsel  
Attorneys for County Defendants

Dated: August 12, 2011

Sally Steinhart, Plaintiff in pro per

By: /s/ Sally Steinhart  
Sally Steinhart

**[PROPOSED] ORDER**

Pursuant to and in accordance with the foregoing Stipulation, and with good cause appearing, it is hereby ordered as follows:

1. The hearing on County Defendants' pending Motion to Dismiss the TAC (Dkt. No. 47) and Anti-SLAPP Motion to Strike under CCP § 425.16 (Dkt. No. 50) is continued to September 29, 2011, at 1:30 p.m.
2. The briefing schedule on such Motions is extended to permit Plaintiff to file her oppositions through August 31, 2011, and for County Defendants to file their replies through September 8, 2011.
3. The Case Management Conference, currently set for August 25, 2011, is continued to September 29, 2011, at 1:30 p.m. A joint case management conference statement shall be filed one week prior to the conference.

IT IS SO ORDERED.

Date: 8/12/11

  
\_\_\_\_\_  
HONORABLE RICHARD SLEEBORG  
United States District Judge